



***Washington State
Community Development Block Grant
Program***

**1997 GENERAL PURPOSE GRANT
APPLICATION HANDBOOK**

September 1996

APPENDICES

**DEPARTMENT OF COMMUNITY, TRADE AND
ECONOMIC DEVELOPMENT**



APPENDICES

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APPENDIX A: ELIGIBLE AND INELIGIBLE JURISDICTIONS

1. Eligible Jurisdictions

a. Non-Entitlement Cities and Towns:

Aberdeen	Ferndale	Mount Vernon	Springdale
Albion	Forks	Moxee	St. John
Almira	Friday Harbor	Naches	Starbuck
Anacortes	Garfield	Napavine	Stevenson
Asotin	George	Nespelem	Sumas
Benton City	Goldendale	Newport	Sunnyside
Bingen	Grand Coulee	Nooksack	Tekoa
Blaine	Grandview	North	Tenino
Brewster	Granger	Bonneville	Tieton
Bridgeport	Hamilton	Northport	Toledo
Bucoda	Harrah	Oak Harbor	Tonasket
Burlington	Harrington	Oakesdale	Toppenish
Cashmere	Hartline	Oakville	Tumwater
Castle Rock	Hatton	Ocean Shores	Twisp
Cathlamet	Hoquiam	Odessa	Union Gap
Centralia	Ilwaco	Okanogan	Uniontown
Chehalis	Ione	Omak	Vader
Chelan	Kahlotus	Oroville	Waitsburg
Chewelah	Kalama	Othello	Walla Walla
Clarkston	Kelso	Palouse	Wapato
Cle Elum	Kettle Falls	Pateros	Warden
Colfax	Kittitas	Pe Ell	Washtucna
College Place	Krupp	Pomeroy	Waterville
Colton	La Conner	Port Angeles	Wenatchee
Colville	La Crosse	Port Townsend	West Richland
Conconully	Lacey	Prescott	Westport
Concrete	Lamont	Prosser	White Salmon
Connell	Langley	Pullman	Wilber
Cosmopolis	Leavenworth	Quincy	Wilson Creek
Coulee City	Lind	Rainier	Winlock
Coulee Dam	Long Beach	Raymond	Winthrop
Coupeville	Longview	Reardan	Yelm
Creston	Lyman	Republic	Zillah
Cusick	Lynden	Ritzville	
Davenport	Mabton	Riverside	
Dayton	Malden	Rock Island	
East	Mansfield	Rosalia	
Wenatchee	Marcus	Roslyn	
Electric City	Mattawa	Royal City	
Ellensburg	McCleary	Sedro Woolley	
Elma	Mesa	Selah	
Elmer City	Metaline	Sequim	
Endicott	Metaline Falls	Shelton	
Entiat	Montesano	Soap Lake	
Ephrata	Morton	South Bend	
Everson	Moses Lake	South Cle Elum	
Farmington	Mossyrock	Sprague	

b. Non- Entitlement Counties:

Adams	Franklin	Lincoln	Thurston
Asotin	Garfield	Mason	Wahkiakum
Benton	Grant	Okanogan	Walla Walla
Chelan	Grays Harbor	Pacific	Whatcom
Clallam	Island	Pend Oreille	Whitman
Columbia	Jefferson	San Juan	Yakima
Cowlitz	Kittitas	Skagit	
Douglas	Klickitat	Skamania	
Ferry	Lewis	Stevens	

2. INELIGIBLE JURISDICTIONS

a. Entitlement Cities and Towns:

Airway Heights	Duvall	Mercer Island	Sea Tac
Algona	Eatonville	Mill Creek	Seattle
Arlington	Edmonds	Millwood	Shoreline
Auburn	Enumclaw	Milton	Skykomish
Bainbridge	Everett	Monroe	Snohomish
Island	Fairfield	Mountlake	Snoqualmie
Battle Ground	Federal Way	Terrace	South Prairie
Beaux Arts	Fife	Mukilteo	Spangle
Village	Fircrest	Newcastle	Spokane
Bellevue	Gig Harbor	Normandy Park	Stanwood
Bellingham	Gold Bar	North Bend	Steilacoom
Black Diamond	Granite Falls	Olympia	Sultan
Bonney Lake	Hunts Point	Orting	Sumner
Bothell	Index	Pacific	Tacoma
Bremerton	Issaquah	Pasco	Tukwila
Brier	Kennewick	Port Orchard	University Place
Buckley	Kent	Poulsbo	Vancouver
Burien	Kirkland	Puyallup	Washougal
Camas	La Center	Redmond	Waverly
Carbonado	Lake Forest	Renton	Wilkeson
Carnation	Park	Richland	Woodinville
Cheney	Lake Stevens	Ridgefield	Woodland
Clyde Hill	Latah	Rockford	Woodway
Darrington	Lynnwood	Roy	Yacolt
Deer Park	Marysville	Ruston	Yakima
Des Moines	Medical Lake		Yarrow Point
Du Pont	Medina		

b. Entitlement Counties:

Clark	Pierce
King	Snohomish
Kitsap	Spokane

APPENDIX B: ELIGIBLE AND INELIGIBLE ACTIVITIES

PART 1: OVERVIEW

A synopsis for each of the general types of CDBG eligible activities is provided below:

- Housing - CDBG funds may be used to rehabilitate publicly, or privately-owned single- or multi-family housing units, commercial buildings, and other non-residential structures. Energy conservation improvements and removal of architectural barriers are eligible rehabilitation activities, as is the cost of connecting residential structures to available water and sewer lines. Rehabilitation assistance may be provided in the form of grants, loans, loan guarantees, or interest supplements.

This category also includes acquisition and renovation of housing units to provide emergency shelter or housing for groups with special needs. Projects to provide permanent low-cost shelter and housing opportunities for low- and moderate-income families such as shared housing, housing cooperatives, mobile home parks, manufactured housing, and self-help housing programs may also be assisted with CDBG. Activities in support of new housing construction - such as land acquisition, site improvements, and infrastructure improvements are eligible. New construction of the housing itself is generally ineligible. With HUD approval, CDBG funds may be used to fund new housing construction when such activities are undertaken by (1) neighborhood-based nonprofit organizations, (2) small business investment companies, or (3) local development corporations. **(Prospective applicants are advised to contact CDBG Program staff when considering new housing construction.)**

- Economic Development - CDBG funds may be used for acquisition, construction, or reconstruction of commercial or industrial buildings; cooperative or employee stock ownership programs; special training and accessibility modifications designed to increase employment opportunities for disabled persons; downtown revitalization; and assistance to private for-profit entities such as grants, loans, loan guarantees, interest supplements, or technical assistance for implementing projects. Economic development activities may be implemented by private for-profit entities when the project will create or retain permanent jobs primarily for low- and moderate-income people or when the business provides services primarily to residents of an area with a majority of low- and moderate-income persons, **provided the need for public funds is clearly balanced by the extent of public benefit received.**

The economic development category also includes revolving loan fund capitalization. Applications for revolving loan fund capitalization must demonstrate a need for finance capital assistance, and/or loan packaging assistance, beyond what is currently provided by existing programs, such as the Development Loan Fund and the Community Development Finance Program. CTED encourages applications that are clearly necessary and appropriate when compared to an anticipated public benefit. It should be understood, however, that unless a specific business (or businesses) is identified in the application as a confirmed, eligible participant, the overall need for this type of assistance must have been documented as meeting the "appropriate" criteria. Guidance for performing the analysis is located with the Economic Development Project Application Instructions.

- Community Facilities - CDBG funds may be used for acquisition, design, construction, or rehabilitation of community facilities to serve low- and moderate-income youth, elderly, or other low- and moderate-income groups with special needs. **Community facility projects must plan to provide the intended benefit for at least 10 years.**

CDBG funds may also be used to rehabilitate publicly-owned, historic properties which are sites or buildings listed, or eligible to be listed, in the National Register of Historic Places or in state or local inventories. Privately-owned historic properties may also be rehabilitated.

Eligible parks and recreation projects include acquisition, design, site preparation, drainage, construction, and rehabilitation of parks and recreation facilities. Acquisition of land for open space is also eligible.

- Public Facilities - CDBG funds may be used to design, construct, or reconstruct water and sewer systems, flood and drainage facilities, solid waste disposal facilities, streets, and sidewalks. Public facilities projects must serve existing low- and moderate-income neighborhoods and communities. Low- and moderate-income property owners cannot be assessed or charged a fee to recover the capital costs of any CDBG-funded public facility.

This category also includes acquisition, design, construction, or rehabilitation of fire protection facilities, and purchase of fire protection equipment.

- Comprehensive - A comprehensive project includes activities listed in at least two of the other categories. For example, neighborhood revitalization by improving streets, sewer, water, and housing, is considered comprehensive. These activities must be related and coordinated to achieve more results than would be possible when addressed individually.

- Other Eligible Activities - The following activities are eligible, and depending on the context, may qualify as elements of any of the above project categories:

- ▲ Public Services - CDBG funds may be used to support or provide social and health services such as emergency services, nutrition, transportation, counseling, employment, crime prevention, education, child care, energy conservation, and health/dental care programs. \$150,000 has been made available for public service activities which support the larger project. However, CDBG generally cannot fund public service projects which have been funded with local or state funds within the previous calendar year.

- ▲ Local Match - CDBG funds may be used for the non-federal share required by other federal or state grant programs used to support CDBG-eligible activities.

Relocation - CDBG funds may be used for relocation payments and assistance to permanently or temporarily displaced individuals, families, or businesses. All CDBG proposals that may cause displacement must include relocation assistance in the project plan and budget.

PART 2: COMPLETE LIST

Title 1 of the Housing and Community Development Act of 1974, as amended through 1992 is the Congressionally adopted statute from which most of the CDBG Program regulations are developed. Section 105(a) identifying eligible activities is reproduced, in its entirety, below:

ELIGIBLE ACTIVITIES

Sec. 105 (a) Activities assisted under this title may include only:

- (1) the acquisition of real property (including air rights, water rights, and other interests therein) which is (A) blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth; (B) appropriate for rehabilitation or conservation activities; © appropriate for the preservation or restoration of historical sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development; (D) to be used for the provision of public works, facilities, and improvements eligible for assistance under this title; or (E) to be used for other public purposes;
- (2) the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements;
- (3) code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area;
- (4) clearance, demolition, removal, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for rehabilitation, and rehabilitation of privately owned properties and including the renovation of closed school buildings);
- (5) special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons;
- (6) payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this title;
- (7) disposition (through sale, lease, donation or otherwise) of any real property acquired pursuant to this title or its retention for public purposes;
- (8) provisions of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, energy conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by the said unit, or received by such unit from the state in which it is located) during any part of the twelve-month period immediately preceding the date of submission of the statement with respect to which funds are to be made available under this title, and which are to be used for such

services, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government, except that not more than 15 percent of the amount of any assistance to a unit of general local government under this title may be used for activities under this paragraph unless such unit of general local government used more than 15 percent of the assistance received under this title for fiscal year 1982 or fiscal year 1983 for such activities (excluding any assistance received pursuant to Public Law 98-8), in which case such unit of general local government may use not more than the percentage or amount of such assistance used for such activities for such fiscal year, whichever method of calculation yields the higher amount;

(9) payment of the non-federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under this title;

(10) payment of the cost of completing a project funded under Title I of the Housing Act of 1949;

(11) relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate;

(12) activities necessary (A) to develop a comprehensive community development plan, and (B) to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively (i) determine its needs, (ii) set long-term goals and short-term objectives, (iii) devise programs and activities to meet these goals and objectives, (iv) evaluate the progress of such programs in accomplishing these goals and objectives, and (v) carry out management, coordination, and monitoring of activities necessary for effective planning implementation;

(13) payment of reasonable administrative costs related to establishing and administering federally approved enterprise zones and payment of reasonable administrative costs and carrying charges related to the planning and execution of community development and housing activities, including the provision of information and resources to residents of areas in which community development and housing activities are to be concentrated with respect to the planning and execution of such activities, and including the carrying out of activities as described in section 701(e) of the Housing Act of 1954 on the date prior to the date of enactment of the Housing and Community Development Amendments of 1981;

(14) provision of assistance including loans (both interim and long term) and grants for activities which are carried out by public or private nonprofit entities, including (A) acquisition of real property; (B) acquisition, construction, reconstruction, rehabilitation, or installation of (i) public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and (ii) commercial or industrial buildings or structures and other commercial or industrial real property improvements; and © planning;

(15) assistance to neighborhood-based nonprofit organizations, local development corporation, nonprofit organizations serving the development needs of the communities or non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of Section 101(c), and assistance to neighborhood-based nonprofit organizations, for the purpose of assisting, as part of neighborhood revitalization or other community development, the

development of shared housing opportunities (other than by construction of new facilities) in which elderly families (as defined in Section 3(b)(3) of the United States Housing Act of 1937) benefit as a result of living in a dwelling in which the facilities are shared with others in a manner that effectively and efficiently meets the housing needs of the residents and thereby reduces their cost of housing;

(16) activities necessary to the development of energy use strategies related to recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as:

(A) an analysis of the manner in, and the extent to which energy conservation objectives will be integrated into local government operation, purchasing and service delivery, capital improvements budgeting, waste management, district heating and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions; and

(B) a statement of the action the recipient will take to foster energy conservation and the use of renewable energy resources in private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low- and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities.

(17) provisions of assistance to private, for-profit entities, when the assistance is necessary or appropriate to carry out an economic development project;

(18) the rehabilitation or development of housing assisted under Section 17 of the United States Housing Act of 1937; and

(19) provision of assistance to facilitate substantial reconstruction of housing owned and occupied by low-income persons (A) where the need for reconstruction was not determinable until after rehabilitation under this section had already commenced, or (B) where the reconstruction is part of a neighborhood rehabilitation effort and the grantee (i) determines the housing is not suitable for rehabilitation, and (ii) demonstrates to the satisfaction of the Secretary that the cost of substantial reconstruction is significantly less than the cost of new construction and less than the fair market value of the property after substantial reconstruction; and

(20) provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities, which assistance shall not be considered a planning cost as defined paragraph (12) or administrative cost as defined in paragraph (13);

(21) housing services, such as housing counseling, energy auditing, preparation of work specification, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in housing activities authorized under this section, or under Title II of the Cranston-Gonzalez National Affordable Housing Act, except that activities under this paragraph shall be subject to any limitation on administrative expenses imposed by any law;

(22) provision of assistance by recipients under this title to institutions of higher education having a demonstrated capacity to carry out eligible activities under this subsection for carrying out such activities;

(23) provision of assistance to public and private organizations, agencies, and other entities (including nonprofit and for-profit entities) to enable such entities to facilitate economic development by:

(A) providing credit (including providing direct loans and loan guarantees, establishing peer lending programs) for the establishment, stabilization, and expansion of microenterprises;

(B) providing technical assistance, advice, and business support services (including assistance, advice, and support relating to developing business plans, securing funding, conducting marketing, and otherwise engaging in microenterprise activities) to owners of microenterprises and persons developing microenterprises; and

(C) providing general support (such as peer support programs and counseling) to owners of microenterprises and persons developing microenterprises;

(24) activities necessary to make essential repairs and to pay operating expenses necessary to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low-income neighborhoods; and

(25) provision of direct assistance to facilitate and expand home ownership among persons of low-income (except that such assistance shall not be considered a public service for purpose of paragraph (8) by using such assistance to:

(A) subsidize interest rates and mortgage principal amounts for low-income home buyers;

(B) finance the acquisition by low-income home buyers of housing that is occupied by the home buyers;

(C) acquire guarantees for mortgage financing obtained by low-income home buyers from private lenders (except that amounts received under this title may not be used under this subparagraph to directly guarantee such mortgage financing and grantees under this title may not directly provide such guarantees);

(D) provide up to 50 percent of any down payment required from low-income home buyer; or

(E) pay reasonable closing costs (normally associated with the purchase of a home) incurred by low-income home buyer.

(b) Upon the request of the recipient of assistance under this title, the Secretary may agree to perform administrative services on a reimbursable basis on behalf of such recipient in connection with loans or grants for the rehabilitation of properties as authorized under subsection (a)(4).

(c)(1) In any case in which an assisted activity described in paragraph (14) or (17) of subsection (a) is identified as principally benefiting persons of low-income, such activity shall:

(A) be carried out in a neighborhood consisting predominately of person of low-income and provide services for such person; or

(B) involve facilities designed for use predominately by person of low-income; or

(C) involve employment of persons, a majority of whom are persons of low-income.

(2)(A) In any case in which an assisted activity described in subsection (a) is designed to serve an area generally and is clearly designed to meet identified needs of persons of low-income in such area, such activity shall be considered to principally benefit persons of low income if (i) not less than 51 percent of the residents of such area are persons of low-income; (ii) in any metropolitan city or urban county, the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low-income; or (iii) the assistance for such activity is limited to paying assessments (including any charge made as a condition of obtaining access) levied against properties owned and occupied by persons of low-income to recover the capital cost for a public improvement.

(B) The requirements of subparagraph (A) do not prevent the use of assistance under this title for the development, establishment, and operation for not to exceed 2 years after its establishment of a uniform emergency telephone number system if the Secretary determines that:

(i) such system will contribute substantially to the safety of the residents of the area served by such system;

(ii) not less than 51 percent of the use of the system will be by persons of low-income; and

(iii) other federal funds received by the grantee are not available for the development, establishment, and operation of such system due to the insufficiency of the amount of such funds, the restrictions on the use of such funds, or the prior commitment of such funds for other purposes by the grantee. The percentage of the cost of the development, establishment, and operation of such a system that may be paid from assistance under this title and that is considered to benefit low-income persons is the percentage of the population to be served that is made up of persons of low-income.

(3) Any assisted activity under this title that involves the acquisition or rehabilitation of property to provide housing shall be considered to benefit persons of low-income only to the extent such housing will, upon completion, be occupied by such persons.

INELIGIBLE ACTIVITIES

Although ineligible activities are not specifically identified in Title I, the Code of Federal regulations (CFR's), developed from the statute, provide guidance. According to 24 CFR 570.207, the general rule is that any activity that is not authorized under the provisions of 570.201 - 570.206 of this Subpart is ineligible to be carried out with CDBG funds. This section identifies three specific activities that are ineligible and provides guidance thought to be necessary in determining the eligibility of several other activities frequently associated with housing and community development.

(A) THE FOLLOWING ACTIVITIES MAY NOT BE CARRIED OUT USING CDBG FUNDS:

- (1) Buildings or portions thereof used predominantly for the general conduct of government cannot be assisted with CDBG funds. Such buildings include, but are not limited to: city halls and other headquarters of government where governing body of the recipient meets regularly, courthouses, and other state or local government office buildings. This does not exclude, however, the removal of architectural barriers under Subpart 570.201 (k) and historic preservation under 570.202(d) involving any such building. Also, where acquisition of real property includes an existing improvement which is to be utilized in the provision of a building or facility for the general conduct of government, the portion of the acquisition cost attributable to the land is eligible *provided such acquisition meets a national objective, (570.208)*.
- (2) General government expenses. Except as otherwise specifically authorized in this Subpart or under OMB Circular A-87, expenses required to carry out the regular responsibilities of the unit of general local government are not eligible for assistance under this Part.
- (3) Political activities. CDBG funds shall not be used to finance the use of facilities or equipment for political purposes or to engage in other partisan political activities, such as candidate forums, voter transportation, or voter registration. However, a facility originally financed in whole or in part with CDBG funds may be used on an incidental basis to hold political meetings, candidate forums, or voter registration campaigns, provided that all parties and organizations have access to the facility on an equal basis, and are assessed equal rent or use charges, if any.

(B) THE FOLLOWING ACTIVITIES MAY NOT BE CARRIED OUT WITH CDBG FUNDS UNLESS AUTHORIZED UNDER PROVISIONS OF 570.203 OR AS OTHERWISE SPECIFICALLY NOTED HEREIN, OR WHEN CARRIED OUT BY A SUBRECIPIENT UNDER THE PROVISIONS OF 570.204.

- (1) Purchase of equipment. The purchase of equipment with CDBG funds is generally ineligible.
 - (i) Construction equipment. The purchase of construction equipment is ineligible, but compensation for the use of such equipment through leasing, depreciation, or use allowances pursuant to OMB Circulars A-87 or A-122 as applicable for an otherwise eligible activity is an eligible use of CDBG funds. However, the purchase of construction equipment for use as part of a solid waste disposal facility is eligible under Subpart 570.201(c).
 - (ii) Fire protection equipment. Fire protection equipment is considered for this purpose to be an integral part of a public facility and thus, purchase of such equipment would be eligible under 570.201(c).

(iii) Furnishings and personal property. The purchase of equipment, fixtures, motor vehicles, furnishings, or other property which is not an integral structural fixture is generally ineligible. CDBG funds may be used, however, to purchase, or to pay depreciation or use allowances (in accordance with OMB Circulars A-87 or A-122, as applicable), for such items when necessary for use by a recipient or its subrecipients in the administration of activities assisted with CDBG funds, or when eligible as fire fighting equipment, or as a public service pursuant to Subpart 570.201(e).

(2) Operating and maintenance expenses. The general rule is that any expense associated with repairing, operating or maintaining public facilities and services is ineligible. Specific exceptions to this general rule are operating and maintenance expenses associated with public service activities, interim assistance and office space for program staff employed in carrying out the CDBG program. For example, where a public service is being assisted with CDBG funds, the cost of operating and maintaining that portion of the facility in which the service is located is eligible as part of the public service. Examples of ineligible operating and maintenance expenses are:

(I) Maintenance and repair of streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for the handicapped, parking and similar public facilities. Examples of maintenance and repair activities for which CDBG funds may not be used include the filling of pot holes in streets, repairing cracks in sidewalks, the mowing of recreational areas, and the replacement of expended street light bulbs.

(ii) Payment of salaries for staff, utility costs and similar expenses necessary for the operation of public works and facilities.

(3) New housing construction. Assistance may not be used for the construction of new permanent residential structures or for any program to subsidize or finance such new construction, except:

(I) As provided under the last resort housing provisions set forth in 49 CFR Part 24; or

(ii) As authorized under 570.201(m); or

(iii) When carried out by a subrecipient pursuant to 570.204(a).

(4) Income payments. The general rule is that assistance shall not be used for income payments for housing or any other purpose. Examples of ineligible income payments include payments for income maintenance, housing allowances, down payments and mortgage subsidies.

APPENDIX C: 1996 INCOME LIMITS

COUNTY	%	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
ADAMS	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
ASOTIN	50	11850	13500	15200	16900	18250	19600	20950	22300
	80	18950	21650	24350	27050	29200	31350	33550	35700
BENTON	50	15000	17100	19250	21400	23100	24800	26550	28250
	80	23950	27400	30800	34250	37000	39700	42450	45200
CHELAN	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
CLALLAM	50	12200	13950	15700	17450	18850	20250	21650	23050
	80	19550	22350	25150	27900	30150	32400	34600	36850
CLARK	50	15550	17750	20000	22200	24000	25750	27550	29300
	80	24850	28400	31950	35500	38350	41200	44050	46900
COLUMBIA	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
COWLITZ	50	13150	15050	16900	18800	20300	21800	23300	24800
	80	21050	24050	27050	30100	32500	34900	37300	39700
DOUGLAS	50	12250	14000	15750	17500	18900	20300	21700	23100
	80	19600	22400	25200	28000	30250	32500	34700	36950
FERRY	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
FRANKLIN	50	15000	17100	19250	21400	23100	24800	26550	28250
	80	23950	27400	30800	34250	37000	39700	42450	45200
GARFIELD	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500

APPENDIX C: 1996 INCOME LIMITS

COUNTY	%	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
GRANT	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
GRAYS HARBOR	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
ISLAND	50	18500	21100	23750	26400	28500	30600	32750	34850
	80	29100	33300	37450	41600	44950	48250	51600	54900
JEFFERSON	50	12100	13800	15500	17250	18650	20000	21400	22750
	80	19300	22100	24850	27600	29800	32000	34200	36450
KING	50	18500	21100	23750	26400	28500	30600	32750	34850
	80	29100	33300	37450	41600	44950	48250	51600	54900
KITSAP	50	15700	17950	20200	22450	24250	26050	27850	29650
	80	25150	28750	32350	35900	38800	41650	44550	47400
KITITITAS	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
KLICKITAT	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
LEWIS	50	11850	13500	15200	16900	18250	19600	20950	22300
	80	18950	21650	24350	27050	29200	31350	33550	35700
LINCOLN	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
MASON	50	12650	14500	16300	18100	19550	21000	22450	23900
	80	20250	23150	26050	28950	31300	33600	35900	38250
OKANOGAN	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500

APPENDIX C: 1996 INCOME LIMITS

COUNTY	%	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
PACIFIC	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
PEND OREILLE	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
PIERCE	50	15150	17300	19500	21650	23400	25100	26850	28600
	80	24250	27700	31200	34650	37400	40200	42950	45700
SAN JUAN	50	16150	18500	20800	23100	24950	26800	28650	30500
	80	25850	29550	33250	36950	39900	42850	45850	48800
SKAGIT	50	13400	15300	17250	19150	20700	22200	23750	25300
	80	21450	24500	27600	30650	33100	35550	38000	40450
SKAMANIA	50	11950	13650	15350	17050	18400	19800	21150	22500
	80	19100	21800	24550	27300	29450	31650	33850	36000
SNOHOMISH	50	18500	21100	23750	26400	28500	30600	32750	34850
	80	29100	33300	37450	41600	44950	48250	51600	54900
SPOKANE	50	13350	15300	17200	19100	20650	22150	23700	25200
	80	21400	24450	27500	30550	33000	35450	37900	40350
STEVENS	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
THURSTON	50	15750	18000	20250	22500	24300	26100	27900	29700
	80	25200	28800	32400	36000	38900	41750	44650	47500
WAHKIAKUM	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500
WALLA WALLA	50	12550	14300	16100	17900	19350	20750	22200	23650
	80	20050	22900	25800	28650	30950	33200	35500	37800

APPENDIX C: 1996 INCOME LIMITS

COUNTY	%	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
WHATCOM	50	14400	16500	18550	20600	22250	23900	25550	27200
	80	23050	26350	29650	32950	35600	38250	40850	43500
WHITMAN	50	13550	15500	17400	19350	20900	22450	24000	25550
	80	21650	24750	27850	30950	33450	35900	38400	40850
YAKIMA	50	11750	13450	15100	16800	18150	19500	20850	22200
	80	18800	21500	24200	26900	29050	31200	33350	35500

APPENDIX D: COMMUNITY DEVELOPMENT AND HOUSING PLAN GUIDELINES (DEFINITIONS AND DATA SOURCES)

Definition of Terms

Community Development and Housing Needs - The community needs which are to be reviewed in a Community Development and Housing Plan include, but are not limited to:

- Economic development
- Public facilities and infrastructure
- Housing
- Historic preservation
- Social service needs

The Community Development and Housing Plan should address these community needs for the general population and the low-income population in particular.

Community Meeting - Any meeting of citizens and community representatives which is open to the public, such as town meetings, symposiums, work groups, committees, etc. The purpose of the meeting may be to obtain the views of citizens, to educate the public on community issues, and to respond to proposals for and questions about community development and housing needs. To meet the citizen participation requirements of the CDBG Program, a community meeting is required to be well-advertised and handicap-accessible. **Community meetings are encouraged, but do not satisfy the need for a public hearing prior to CDBG application submittal.**

Low-Income Persons - Persons whose household income is 80 percent or less than the county median income. See Appendix C for Low-Income Limits.

Public Hearing - A meeting of a governmental body during which the public is invited to speak to the council and the council primarily listens and receives public input. A public hearing may be held as part of a regularly scheduled public meeting where official decisions may then be made. Official decisions are not required during the meeting. Reasonable public notice, at least 14 days, must be made prior to the hearing date. **At least one official public hearing, conducted by the jurisdiction, is required prior to CDBG application submittal.**

Special Needs Populations - Applicants who may require special outreach efforts in order to encourage citizen participation. These populations include, but are not limited to:

- Abused children
- Elderly persons
- Battered spouses
- Homeless persons
- Handicapped persons
- Illiterate persons
- Migrant farm workers

DATA SOURCES

A variety of data sources may be used to identify community needs during development of the Community Development and Housing Plan. A partial list of possible data sources follows. The applicable portion of these documents may be referenced and quoted; the entire document need not be submitted.

Needs Survey and/or Assessment

Communities are encouraged to develop and use a citizen participation process to identify and prioritize their needs, especially those of low-income persons. A variety of methods can be utilized, among them community meetings, task forces, outreach to civic groups, and community surveys. Surveys may be especially convenient, particularly when combined with the required income and household size characteristics for application to the CDBG General Purpose Grant. A CDBG Community Survey Guide is included in Appendix E.

Plans, Reports, and Studies

Some communities have completed plans, reports, and studies which identify various community development and housing needs. The following are examples of documents which may be available:

- Comprehensive Land Use Plans
- Capital Facility Plans
- Comprehensive Waste Water Management Plans
- Neighborhood Land Use Plans
- Engineering Reports
- Storm Drainage Master Plans
- Market or Feasibility Analyses
- Environmental Impact Statements
- Bikeway/Pedestrian Safety Studies
- Six-Year Street Plan
- Coordinated Service-Delivery Plans
- SWOT Analyses (Strengths/Weaknesses/Opportunities/Threats)
- Americans with Disabilities Act (ADA) Self-Evaluation

City or County Records

A variety of records maintained by communities provides information on community development and housing needs:

- Minutes of Public Hearings, including Local Budget Hearings
- Utility Maintenance Records
- Health District Reports
- Business Licenses
- Property Assessment Records

- Waiting Lists for Services (Assessment Subsidies, Housing Rehabilitation, Business Expansion Loans, Subsidized Housing)
- Information Prepared for Public Works Inventories

Federal or State Sources

Community development and housing needs may also be documented by data collected by the federal or state government.

- United States Census
- Washington State Office of Financial Management
- Washington State Employment Security Department
- Postal Vacancy Rate
- Citations from Various Federal and State Agencies Regarding Noncompliance

APPENDIX E: COMMUNITY SURVEY GUIDE

A STEP-BY-STEP SURVEY PROCESS FOR DETERMINING INCOME LEVELS AND ASSESSING NEEDS OF LOW-INCOME HOUSEHOLDS

INTRODUCTION

This guide outlines a step-by-step survey process for determining income levels and assessing the needs of low-income households. It is intended for use by local officials, staff, and volunteers working for jurisdictions eligible to apply for funding through the Washington State Community Development Block Grant Program. It contains instructions necessary for a jurisdiction to develop, administer, and document a statistically valid income survey and to determine whether a target area or target population will meet CDBG Program requirements related to low-income benefits. It also contains instructions for conducting a community needs survey, as a separate process or in tandem with an income survey. It is recommended that this guide be used with a current copy of the Washington State Community Development Block Grant Program General Purpose Grant Application Handbook.

An income survey is required of any applicant submitting a project proposal which provides area-wide benefit. The survey demonstrates the amount of benefit low-income people in the community will derive from the project if it is selected for funding. The minimum percentage of low-income benefit required of an area-wide benefit project is 51 percent. The higher the percentage of benefit, the higher the project will score in terms of low-income benefit--one of many factors considered in rating CDBG General Purpose Grant Program applications.

An income survey conducted within the past eighteen months may be used to meet this requirement if the applicant can demonstrate that the survey results are still current and representative of the community. This may be accomplished by documenting that population size, demographics, unemployment rate, and employment has remained nearly the same since the survey. Sources of documentation include: hospitals, realtors, local employers, the Washington State Office of Financial Management, and/or the Washington State Department of Employment Security.

A community proposing a project which will provide direct benefits to persons or households who are individually qualified on the basis of income prior to receiving the service is not required to conduct an income survey. Instead, the benefit requirement of the program is judged to have been met by the type of activities and services proposed and the commitment on the part of the applicant to screen beneficiaries for income eligibility prior to delivering the service. In most cases, since all benefits are delivered to income qualified persons or households, such an application receives a 100 percent benefit score during the rating and selection process.

A community needs survey is a tool commonly used by applicants to respond to a second aspect of the CDBG General Purpose Grant Program application process -- the requirement that each applicant jurisdiction conduct a process to determine and document community development and housing needs of the community as a whole and those of low-income residents. Applicants proposing either area-wide benefit or direct benefit projects are encouraged to consider using a survey to identify community development and housing needs. The CDBG Program places emphasis on the identification and prioritization of the community development needs of low-income persons. In some cases, an applicant may choose to conduct a combined income and community needs survey to simultaneously demonstrate low-income priority needs and the percent benefit that would be achieved if activities were proposed in the CDBG application to address them.

DEFINITIONS

The following definitions explain terms which are used throughout this survey guidebook:

A. LOW-INCOME HOUSEHOLDS

For the purposes of evaluating and rating CDBG applications, a “low-income household” is defined as one whose income is no more than 80 percent of the median family income for the county. Refer to Appendix C: 1996 Low-Income Limits.

B. Area Benefit Project

Benefits provided to low-income households by a CDBG project may be either area-wide or direct. Area benefit activities meet the identified needs of all households within a clearly defined target area or jurisdiction, and at least 51 percent of the households are low-income. Development of a park or construction of a municipal sewage treatment plant to benefit a community or neighborhood with a high percentage of low-income persons are examples of projects that provide area-wide benefits. Any applicant submitting a project proposal which provides area-wide benefit may either use 1990 Census Data or conduct an income survey. Income surveys conducted after January 1991 will be acceptable.

C. Direct Benefit Project

Direct benefit activities clearly focus on benefiting low-income persons or members of eligible special groups rather than all residents of a particular area. A housing rehabilitation project providing loans to low-income homeowners, or a public facility construction project paying the property assessment for resident low-income property owners are examples of direct benefit projects.

D. Universe

The universe is the entire target area, geographic area, or population to be served by a CDBG-funded project or activity.

E. Sample Group

A sample group is a number of households which have been randomly selected from a universe or target area. Random selection of an adequate-sized sample group ensures that it is representative of the universe from which it has been drawn. Estimates are made about the universe from the sample group. By asking carefully framed questions and interpreting them correctly from an adequate-sized randomly drawn sample, surveyors can be assured that the overall estimates have a reasonable degree of accuracy. For instance, assume that the universe is a neighborhood containing about 400 homes. By sampling a portion of the 400 households residing within that neighborhood, estimates may be made about the incomes or needs of all residents of the 400 households.

F. Total Household Income

Total Household Income is all gross wages, tips, and salaries earned by all members of the household in the previous twelve (12) months.

STEP ONE: APPOINT SURVEY COORDINATOR

The first step of a survey process is to recognize that a survey will typically take planning, coordination, and effort over a period ranging from several days to several months depending on the goals of the survey process and the size of the population or target area to be surveyed. To ensure that the effort yields statistically valid results, it is recommended that a survey coordinator be appointed to lead the process and provide oversight through all steps, from beginning to end. An applicant community has several options available for selecting and appointing a survey coordinator. It may be possible to use an existing member of the jurisdiction's administrative, planning, community development, or public works department staff. It may also be possible to recruit a volunteer to serve as the coordinator. In some cases, a community may choose to hire a consultant to oversee and conduct the survey process, although the steps outlined in this guidebook are designed for people who have no prior survey expertise. Many communities have used resources available to them through local community colleges and universities. Some instructors and professors will take on a community survey as part of their planning or social services curriculum. What is important at this stage is: to obtain a commitment from the person selected to see the process through; to be clear about expectations of the job; and to establish effective communication channels with local elected officials.

STEP TWO: DEFINE SURVEY UNIVERSE

Step two of the survey process is designed to yield a definition of the survey universe. Completion of this step is dependent on identifying: the goal or goals of the survey; the physical boundaries of the geographic area to be surveyed or the characteristics of the total population to be surveyed; and the households that exist within the defined geographic area or meet the demographic characteristics of the target population.

A. Identify goals of the survey process.

Each applicant must choose from among at least three possible survey goals which are:

1) to determine incomes of a community, target area, or target population, 2) to determine community development and housing needs of a community, or 3) to determine incomes and needs of a community.

If the goal is to determine incomes of a community, target area, or target population, the process will unfold as an income survey. This is an appropriate choice if the community has already defined the needs of the community and its low-income population and is attempting to demonstrate the area-wide benefit of the priority activities it intends to propose as part of the CDBG General Purpose Grant Program application.

If the goal is to determine community development and housing needs, the process will unfold as a need survey. This is an appropriate choice if the applicant is prepared to conduct a second survey should the needs survey identify area-wide benefit activities as the priorities for a CDBG application. In this case, it is generally assumed that priority needs and target areas have not yet been identified. In some cases, it is also an appropriate choice if the community anticipates that the survey will demonstrate the need for a direct benefit project proposal, which does not require an income survey.

If the goal of the survey is to assess the housing and community development needs of the community while at the same time determining incomes of residents community-wide, a combined income and needs survey process will be necessary. This is an appropriate choice if priority needs are not known and the community intends to conduct only one survey. To accomplish a combined survey, care must be taken to build in neighborhood designations or other indicators of demographic characteristics which can be used to define the target area or target population prioritized activities will ultimately benefit.

B. Identify geographic boundaries or population characteristics of the survey universe.

The geographic boundaries or populations which define the survey universe will vary depending on the goals of the survey process. When priority needs and activities have been identified and an income survey is planned to determine area-wide benefit, the proposed activities determine the geographic area or characteristics of the population which should be included in the survey universe. For example, if the priority activity is a senior center, it follows that the survey universe should include all residents of the community who are senior citizens (age 65 or older.) If the priority need is water system improvements which will benefit a specific neighborhood, then it follows that the survey universe should include the entire geographic area of the neighborhood. If the priority need is a sewer system which will benefit the entire jurisdiction, then it follows that the geographic boundaries of the survey universe should include the entire jurisdiction. In this case the survey universe must conform to geographic boundaries of the service area, or the unique characteristics of the population which will receive services.

When the goal of the survey is to determine needs, the survey universe should correspond to the geographic boundaries of the jurisdiction.

When the goal of the survey is to simultaneously determine needs and incomes community-wide, the survey universe must correspond with the geographic boundaries of the jurisdiction.

C. Identify households within the survey universe.

To complete the process of defining the survey universe, all households in the community, target area, or target population must be identified. A method for identifying the households in a universe must be developed in order to draw a sample group. Ideally, a list of each person living in a universe and their telephone number is available. If a list is available, devise a procedure to randomly select households to be interviewed. If a list is not available, the following resources may be useful for identifying all households in the survey universe:

1. City indexes, if available and up-to-date, usually provide the best source of household information suitable for selecting samples.
2. Reverse directories are potential sources for obtaining sampling information. They help to eliminate households which are located outside a target area.
3. Telephone books are also a potential source for obtaining sampling information. However, people without telephones or those who have unlisted numbers would be excluded from a sample, unless additional tools are used.
4. Tax rolls are another potential source of addresses. The limitation of tax rolls is that they identify only property owners, not the residents. Since property owners and residents may not be the same, additional research will be necessary. Also, tax rolls identify only building addresses, not specific household addresses. For instance, apartment buildings will be listed by address while individual apartments within the building need to be identified for sampling purposes. Tax rolls identify locations for interviews, but cannot be used as the basis of a mail or telephone survey unless a reverse directory is used.

If the survey universe is smaller than the entire community, target area households, or target population households will need to be extracted from the above sources based on addresses. If the survey universe is a target population, it is also often possible to involve other service providers in identifying the number and location of households. In some cases, if the survey universe is a target neighborhood, it is possible to actually walk through the neighborhood and inventory all households.

When planning a combined income and needs survey, it is important to identify households by neighborhood.

STEP THREE: SELECT SURVEY SAMPLE FROM THE HOUSEHOLDS WITHIN THE UNIVERSE

Once the survey universe has been defined, the next step is to select a survey sample of households within the survey universe. To complete this step, it is necessary to: determine the appropriate sample size; establish a process to replace unreachable and other non-response households; and draw the survey sample.

A. Determine sample group size needed to generate the minimum number of required responses.

After all households have been identified, the next step is to determine the sample group size needed to generate the minimum number of responses required for a CDBG income survey. If a jurisdiction does not obtain the minimum number of responses, the activity for which the benefit is claimed will be eliminated, or the entire application may not pass threshold review and will not be accepted for rating and selection.

To help determine sample group size, use Table A, "Required Sample Sizes For Universes of Various Sizes." Listed in Column A are the universe sizes. Listed in Column B are the sample group sizes or the minimum number of needed responses. A hypothetical 400 household neighborhood is used to illustrate the use of this table. Under "Number of Households in the Universe," locate line 399 to 650 households. The number of complete responses required in the sample is 250. (See Attachment 1, Discussion of Sample Size, page 35, for an explanation of how these samples were determined.)

TABLE A
Required Sample Group Sizes For Universes
of Various Sizes

Column A	Column B
Number of Households in the universe	Sample Group Size Needed to Complete Responses Required
1-55	50
56-63	55
64-70	60
71-77	65
78-87	70
88-99	80
100-115	90
116-133	100
134-153	110
154-180	125
181-238	150
239-308	175
309-398	200
399-650	250
651-1,200	300
1,201-2,700	350
2,701 or more	400

B. Establish a process to replace unreachable and other non-response households within the sample.

The sample group sizes listed in Table A indicate the number of interviews that must be completed, not necessarily the number of households that will need to be contacted. They are distinctly different and rarely are they the same number. No matter what is attempted, some households will not be home during the periods set aside for interviewing, some will refuse to be interviewed, some will terminate the interview before it is completed, and some will complete the interview but fail to provide an answer to the key question on income level. **To be considered a completed interview for CDBG purposes, the interview must include complete and accurate information on the respondent's income level.**

Table B indicates the usual rates of response which can be expected from a variety of survey instruments. For example, when conducting a door-to-door survey in a 400 household neighborhood, a sample of 278 to 333 households (250 divided by .90 or .75) should be drawn to obtain 250 completed interviews. Over sampling is one way to deal with unreachable households and other non-response situations.

TABLE B
Expected Response Rates For
Different Types of Surveys

<u>Expected Survey Type</u>	<u>Rate of Response</u>
Mail	25 - 50%
Mail, with letter follow-up	50 - 60%
Mail, with telephone follow-up	50 - 80%
Telephone	75 - 90%
Door-to-Door	75 - 90%

C. Draw Samples.

To acquire a good sample of the universe, everyone in the universe needs to have an equal chance of being included in the sample. To ensure an equal chance, a random sample may be drawn using a random numbers table. (See Attachment 2, Instructions For Using A Random Numbers Table and the Random Numbers Table, pages 37-38.) A random numbers table is a computer generated list of random numbers which can be used in a variety of ways. When using a random numbers table, a sample is drawn from the universe using the numbers appearing on the table. If, for example, the first three random numbers from the table are 087, 384, and 102, the 87th, 384th, and 102nd households from the universe listing will be included in the sample to interview. Continue until the desired sample size is achieved.

As indicated above, it is advisable to over-sample. When unreachable households and other non-response situations are encountered, they may be replaced with households in the over-sample list in the order replacements were selected. For example, if a list of 300 households are drawn in an effort to obtain 250 interviews, the first household written off as “unreachable” should be replaced by the 251st household in the sample.

If a listing is unavailable of all the households in a target area, but the geographic boundaries can be defined, a starting location may be randomly selected and the selection process may proceed systematically from there. For example, in referring back to the hypothetical 400 household neighborhood needing a sample group of 250 households, every 1.6th household (400 divided by 250) should be interviewed to ensure that the entire neighborhood has been sampled. In whole numbers, this works out to about 2 of every 3 households. Therefore, the interviewer can start at one end of the neighborhood and proceed systematically through the entire neighborhood interviewing two households and then skip one. If an interview is not possible, the next household which would have been skipped should be interviewed. Therefore, when the sample group size calls for one of every six households to be sampled, a random number from one to six can be drawn, with the interviewer starting at that household seeking interviews at every sixth household. Unreachables can be replaced with every third household in the six household groups.

Statistically valid results will be obtained if households are not too quickly written off as unreachable. Randomness is most certain if interviews are conducted from the households first selected. Thus, if a door-to-door survey is being conducted, two or more passes through the area (at different times) should be attempted.

Frequently respondents will be busy, but will say that they can do the interview later. An appointment should be made to return and complete the interview. Only after at least two tries or an outright refusal should a sampled household be replaced. With a telephone survey, attempt three calls before replacing a household.

STEP FOUR: SELECT SURVEY METHOD

Those conducting the survey should decide which survey method or combination of survey methods is best for the community, considering the number of people available to assist, the size of the sample needed, and the means available for identifying households to interview.

- A. **A telephone survey** is relatively easy to conduct. The interviewer places a telephone call to a previously determined household, introduces himself, identifies the head of the household or a knowledgeable person, proceeds with the interview, and accurately records the answers. However, the steps that must be taken before making telephone calls may prove difficult. In a telephone survey, the telephone numbers of all the households in the target area must be obtained, and a method for contacting households without telephones or those with unlisted numbers must be devised. A reverse directory, listing telephone numbers by addresses, is helpful especially if a sample of the total population is used or survey boundaries are defined.
- B. **A door-to-door survey** takes more time to conduct because of the “leg work” needed to obtain interviews. First, the interviewer should introduce himself, then make contact with someone who is qualified to speak for the household (i.e., head of household, spouse of the head of household, or someone in the household who is mature and knowledgeable about household income.) Next, the interviewer identifies the purpose of the survey, solicits participation from the respondent, and accurately records the answers.

Small communities often use a door-to-door survey because the target area is easily defined. By developing procedures for sampling within the target area, a list of all households within the target area is not needed beforehand.

- C. **A mail survey** may be the easiest to conduct, but often yields a low rate of response, leading which means a low degree of accuracy. To conduct a mail survey, the community needs a list of all the addresses in the target area; a questionnaire; stamped, self-addressed return envelope; and postage. Also, provisions must be made to provide non English-speaking residents with a questionnaire in their own language. At least one follow-up letter or telephone call may be needed to produce the required number of responses.

- D. **A combination survey** may be advisable in some situations. For example, when no one is home to answer a door-to-door survey, a note may be left requesting that the occupants telephone the interviewer. Similarly, the interviewer may telephone a household to schedule an interview time. A letter may be mailed to residents of the target area informing them of the date a survey will occur and a time an interviewer(s) will be in the area.

STEP FIVE: DEVELOP SURVEY QUESTIONNAIRE

Consistent and accurate responses are more likely to be obtained when questionnaires include a standard introduction explaining the purpose of the survey and ensuring that the respondents' answers will be kept confidential. A procedure to maintain this confidentiality needs to be established. If the respondent's name, address, and telephone number appear only on a cover sheet, it can be thrown away or separated from the questionnaire after the survey is completed. If both the cover sheets and the questionnaires are numbered, they can be matched up if absolutely necessary. What is important is that people will not be able to pick up a questionnaire and see what the Jones family income is.

The same set of questions must be asked in each interview. Questionnaires which contain clearly written questions are more likely to elicit consistent and accurate responses. An additional factor to consider when designing a questionnaire is they cannot be biased or structured to favor one response over another. For example, the questions must not imply that the neighborhood will benefit or receive federal funding if respondents say they have low incomes. **However, it is permissible to disclose that the survey is being conducted to gather essential information to support an application for funding under the State CDBG Program.**

Ideally, questions to determine household income levels and questions related to community development plan priorities are combined into the same survey instrument. Of course, a questionnaire may be designed to ask only the critical questions about income, or only questions about needs. The questionnaire should be long enough to gather needed information; yet brief enough to hold the respondent's attention.

It is advised to test a draft questionnaire to identify questions that are unclear.

- A. **Income Questions** - The purpose of income questions is to determine whether the household being surveyed has an income above or below the low-income limit. Therefore, income questions must provide accurate information for both household size and household income.

Since questions about income are personal, people are often reluctant to answer them. This is especially true if the reason for the question is not understood. One way to handle this problem is to structure the interview process to first explain why income information is needed, and then to ask the two essential income questions: 1) How many people live in your home? and 2) What is the total income of all members of your household?

When conducting a telephone survey, the interviewer should refer to the Low-Income Limits, ask the size of the household, then ask, "During the past 12 months, was the total income of your household less than or more than (the income amount listed for a family of that size)?"

When conducting a door-to-door survey, the interviewer should carry a set of income cards. Each card should have the low-income limit for each size of household. (See Table C for an illustration of how to design income cards.) The interviewer finds the appropriate card for the household, hands it to the respondent, and asks "Would you tell me whether, during the past twelve months, the total income of all members of your household was above or below the figure noted on this card?"

TABLE C
Illustration of Income Cards

<u>Card Number</u>	<u>Persons in Household</u>	<u>Low-Income Level</u>
1	1	\$18,350
2	2	\$21,000
3	3	\$23,600
4	4	\$26,250
5	5	\$28,350
6	6	\$30,450
7	7	\$32,550
8	8	\$34,650

When conducting a mail survey, a clearly written, unbiased questionnaire which includes the two questions about income and household size should be developed. (See Attachment 3, Sample CDBG Income and Community Needs Questionnaire, page 39.)

B. Questions On Community Need and Other Data

The community needs survey is a tool which communities may use when designing a citizen participation process to identify perceived needs of the general community and needs of low-income persons. The information received from this portion of the survey is helpful to identifying community needs before prioritizing those needs and developing a Community Development and Housing Plan.

Additionally, questions concerning needs allow representatives of a local unit of government to compare their own priorities with those of the community's residents. Differences in priorities may signify a need for educating the community or for redefining community priorities. For example, a community may have a severe problem with the sewage system, but the survey response indicates the community development priority of the general population, including low-income persons, is a park. In this case local government officials and staff may need to educate the community about the sewage-system need so a project agreement can be reached.

Needs questions may be developed in many different ways. Two common formats are described below:

- 1) Develop a list of potential community development needs and ask the respondent to rank them in priority order; or
- 2) Ask the respondent to prioritize three or four needed community projects which should be addressed if funds were to become available.

While there is no “right” or “wrong” format, it should fit the type of survey which will be conducted. Do not, for example, ask a respondent to prioritize a long list of possible community development needs during a door-to-door survey. This may be too time-consuming and confusing. A shorter and less confusing approach when conducting a door-to-door survey might be to ask open-ended questions (format 2) concerning community development needs.

No matter how questions concerning need are formatted, special care should be taken to ensure that the questions are not “loaded” or biased so that respondents will answer in a particular way. If a list will be used, it should include the same number of possible responses in all categories. While examples are valuable for clarification, they might encourage the respondent to target a particular need they might not previously have considered.

STEP SIX: PUBLICIZE SURVEY PROCESS

Citizen participation may be promoted by arranging advanced notice. Respondents who know how, when, and why they will be contacted are more likely to complete a questionnaire or an interview. Local newspaper notices, announcements at churches or civic organizations, flyers and radio are means to get information to the public.

As with all aspects of the survey and questionnaire, any publicity must say that the community is applying for a State CDBG grant and that, as part of the application, the community has to provide HUD and the state with current estimates of the income of the residents of the target area. It is not appropriate to say that, in order for the community to receive the desired funding, a survey must be conducted to show that most of the residents of the target area have low-incomes.

STEP SEVEN: RECRUIT AND TRAIN SURVEY STAFF

A. Recruit staff

It is not necessary to go to great expense to hire professional interviewers. Persons from local community groups may volunteer, or colleges which offer courses on civics, public policy, or survey research may be willing to assist as a means of providing their students with practical experience and credit.

It is best to choose interviewers who can make respondents feel comfortable. For this reason, survey research companies often employ mature women as their interviewers. Also, when interviewers are of the same race and social class as the respondent, the survey generates a better response rate and more accurate results. Most important, however, is to select interviewers who will hold the attention of the respondent, ask the questions as they are written, follow respondent selection procedures, and accurately record the responses.

B. Train staff

Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an unresponsive answer, the interviewer should repeat the question exactly as written. Questions should be read in the order in which they are written. The respondent's answers should be recorded neatly and accurately as they are provided. Before proceeding to the next interview, the interviewer should edit the questionnaire to be sure that every answer is clear and accurately recorded. This simple check helps to avoid the need to re-contact the respondent for clarification.

For questions concerning income, note that there may be an important exception to reading the questions in the exact order every time. If questions pertaining to issues other than income are included, and questions on income are placed at the end of the survey, a respondent could end the interview before the critical income question is asked. If it appears to the interviewer that the respondent is about to terminate the interview, it is recommended that he or she immediately try to get an answer to the critical income question.

STEP EIGHT: CONDUCT INTERVIEWS

Interviewers should attempt to contact respondents at a time when they are most likely to get a high rate of response. Telephone interviews are conducted early in the evening when most people are home. Door-to-door interviews also may be conducted early in the evening or on weekends. Attempts should be made at different times to reach anyone in the original sample who is missed by the initial round of interviews.

The interviewer should avoid selecting a time or method that will yield biased results. For example, interviewing only during the day from Monday to Friday probably will miss families where both the husband and wife work. Since these families could have higher incomes than families with only one employed member, poor timing may lead to the biased result of finding an excessively high proportion of low-income households.

Remember, interviewers also should follow the set procedures for replacing unreachable and non-respondents as discussed above in Step 3.

STEP NINE: EDIT QUESTIONNAIRES

Interviewers should return completed surveys in to the survey coordinator. The coordinator should ensure that each survey is complete and that each question is answered clearly. Questions or errors that are found should be referred to the interviewer for clarification. Incomplete or ambiguous responses can be clarified by re-contacting the respondent. Note that editing is an ongoing process. Even after data tabulation or analysis has been started, errors may emerge in the data which need to be corrected.

STEP TEN: TABULATE SURVEY RESULTS

Organize and record survey data on a spreadsheet. Use the data on the spreadsheet to complete the Low-Income Worksheet, Attachment 4, pages 40-42.

Using a spreadsheet software for tabulation may be desirable because the data can easily be checked for accuracy and consistency. However, the calculations can be made by hand or by using a calculator.

STEP ELEVEN: ANALYZE SURVEY RESULTS

Because the survey and subsequent tabulations result in estimates, surveyors should carefully analyze the percent of low-income households to obtain the most accurate estimates. If, after using the steps outlined above, results indicate that 55 percent or more of the households of the target area have low-incomes, it is reasonable to assume that at least 51 percent of the residents actually have low-incomes.

However, if the survey results and tabulation indicate that less than 51 percent of the target area households have low-incomes, the area is presumed to be ineligible. An application for an area-wide benefit project which does not benefit a minimum of 51 percent of low-income persons will not pass threshold review.

If the survey results and tabulation indicate that between 51 and 54 percent of the target area residents have low-incomes, it is likely that a majority of all neighborhood residents have low-incomes. Additional analysis will help determine the extent to which the estimated percentage of low-income households is correct. There are two calculations available to determine the accuracy of the estimated low-income percentage of the survey:

- A Compare the average size of low-income households in the sample with the average size of above low-income households. The closer these figures are to each other, the more accurate the estimated low-income percentage is assumed to be. For example, if the survey indicates that 53 percent of the households are low-income, and if both below low-income households and above low-income households have an average of 3.4 persons, the surveyors can assume the 53 low-income percentage is valid.

- B. The second calculation is to compare the distribution of sizes of households of below low-income with sizes of households of above low-income. Use Table D to help determine this comparison.
1. Count the number of one-person low-income households. Enter this figure in Column A across from number one. Next, count the number of two-person low-income households. Enter this figure in Column A across from number two. Continue this process through the “nine or more” category.
 2. Total Column A.
 3. Divide the number of one-person households by the total number of low-income households (total of Column A). Multiply by 100 to yield the percentage of one-person low-income households. Enter this percentage in Column B across from number one. Continue this process through the “nine or more” category. this percentage column should total 100 percent.
 4. Follow steps 1 through 3 for above low-income households entering the figures in Columns C and D.
 5. Compare the percentages in Column B of low-income households with the percentages in Column D of above low-income households for each of the nine household-size categories. The closer the distribution, the more accurate the estimated low-income percentage from the survey is assumed to be. For example, if among the low-income group, 10 percent have one person, 40 percent have two persons, and 50 percent have three persons, and among the above low-income group 12 percent have one person, 41 percent have two persons, and 47 percent have three persons, a great deal of confidence can be claimed in the estimate.

6. TABLE D

Table For Comparing The Distribution of
Household Size by Household Income

Number of Persons in the Household	Households with Low-Incomes		Households above Low-Incomes	
	Column A	Column B	Column C	Column D
	Number	Percent	Number	Percent
One				
Two				
Three				
Four				
Five				
Six				
Seven				
Eight				
<u>Nine or more</u>				
Totals				

The statistical validity of the survey is increased by locating patterns of the unreachables and non-respondents, or by detecting major gaps in the sample coverage. Analyze the unreachables and non-respondents to verify that they are reasonably random by tabulating the rate of response by street or block in the target area to determine if there are notable gaps in the survey coverage. Next, examine the racial or ethnic population of respondents and compare it with the distribution ratios of the universe or target area. If the ratios are close, the surveyors are assured that the random sample was a good representation of the racial and ethnic population of the target area.

STEP TWELVE: RETAIN DOCUMENTATION OF SURVEY PROCESS AND RESULTS

Maintain survey documentation consisting of completed questionnaires, a list of respondents, a description of the sampling procedures, and survey tabulations.

- A. **Retain completed surveys.** These serve as documentation that the survey was conducted, the proper questions asked, and that the sample was adequate.

To maintain confidentiality, save the cover sheets separately from the survey questions. If necessary, they can be matched later for verification.

- B. **Retain a list of households of the original sample and a list of households actually interviewed.** Compile a list of households which were in the original sample and those households which were actually interviewed. The process used to replace unreachable or other non-respondent households should also be noted.
- C. **Retain sampling procedures.** Written documentation should describe the method used to select sample households.
- D. **Retain data.** Data may be retained on a floppy disk, a spreadsheet, or a table.

DISCUSSION OF SAMPLE SIZES

Samples of the sizes suggested in Table A on page 24 of this section are intended to provide an estimate of the proportion of households that say they have low-incomes that will be within + or -5 percent of the proportion that all households in the area would indicate if all were interviewed. Thus, 200 randomly selected households were interviewed from a 350 household neighborhood and 70 percent indicated that they have low-incomes, it can be reasonably inferred that if all 350 households were interviewed, between 65 and 75 percent of the households would say that they had low-incomes.

In the survey being discussed in this section, the confidence interval probably will be a little less than + or -5 percent. The method here is to estimate the proportion of people who are income-eligible, not the proportion of households. Following the procedures outlined here will result in sampling a fraction of people that is approximately equal to the fraction of households that would be sampled by following Table A (number of people sampled/total number of people = number of households sampled/total number of households). Other things being equal, if the size of the universe is increased and the same sampling fraction is maintained, the confidence interval decreases.

Of course, in this application, other things may not be equal. By sampling households as a cluster for gathering data on individuals, we are departing from a purely random selection of individuals. Thus, the actual confidence can be calculated only after the data actually are collected and the variance on household size and income are analyzed. The actual confidence interval should be a little less than + or -5 percent. But we also included an "analysis" section in the paper to help in determining the extent to which it may be less than + or -5 percent.

INSTRUCTIONS FOR USING A RANDOM NUMBERS TABLE

This attachment contains a two-page table of random numbers. It is just that--each number there is random. It can be used going up, down, sideways, or diagonally, and any column or combination of columns can be used in drawing random numbers. The following are some examples of how the table can be used.

Example 1: Drawing a Sample of 5 of 10

Assume there is a universe listing of 10 households and an interviewer wants to draw a random sample of 5 households. Look on the Random Numbers Table, Attachment 2, pages 38 and 39. Find the number "53" in the upper left hand corner. Let's start with the "5" and work down the column: the numbers we find are "5, 6, 9, 1, and 3." So from the list of 10 households, our sample would include the 31st, 6th, 46th, 39th, and 27th households on the list.

Example 2: Drawing a Sample of 5 of 100

Start this time with the "31" in the lower left hand corner of the table. Let's work across the bottom row from here, and take the numbers "31, 6, 46, 39, and 27." From the list of 100 households, our sample would include the 31st, 6th, 46th, 39th, and 27th households on the list.

Example 3: Drawing a Sample of 5 of 30

Start this time back in the upper left hand corner and start with the "53" and work across. The numbers in order are "53, 95, 67, 80, 79, 94, 28, 69, and 25." Notice that all of these numbers except for the 25 and 28 are greater than 30. Just skip them until a number is found in the correct range. Here, sample the 28th and 25th household on your list and continue until three more (which would be the 13th, the 24th, and the 21st) are found.

Example 4: Drawing a Sample of 5 of 300

Start again with the "53" in the upper left hand corner. Well, actually let's move over one column and start with the "3 95." Since we need a three digit number to cover the size of our universe list, we can use these three (or any three columns--each number is random.) Reading down from the "3 95," we see "3 95, 2 12, 0 16, and 0 59." From the list of 300 households, then, take the 212th, the 16th, and the 59th households (as well as how many more you needed - the next two would be the 217th and the 60th.)

RANDOM NUMBERS TABLE

1	53	95	67	80	79	94	28	69	25	78	13	24	100	62	62	21	1	44	59	90	74	63	4	97
2	62	12	27	41	5	4	19	34	84	78	71	45	73	79	33	57	2	20	79	78	68	31	25	30
3	90	16	47	72	70	2	67	21	65	7	39	58	81	6	4	79	44	47	7	74	34	55	28	90
4	10	59	4	76	80	86	82	20	60	92	33	61	76	83	73	12	8	71	82	28	21	61	31	92
5	32	17	36	64	8	30	80	95	61	33	65	5	39	88	36	44	4	86	61	13	63	15	47	92
6	54	71	27	69	41	53	60	10	2	91	76	95	98	91	64	65	2	0	90	52	26	90	49	31
7	10	60	18	77	34	59	28	99	15	11	70	34	27	78	67	19	9	60	0	22	11	12	54	50
8	42	20	24	36	78	58	82	81	45	91	35	53	30	92	57	19	9	13	39	42	25	3	97	64
9	73	55	87	48	49	97	60	92	27	78	2	55	29	76	99	21	45	24	16	33	50	84	12	65
10	21	56	41	23	58	57	49	49	70	33	6	79	95	3	70	38	26	89	49	0	68	57	53	91
11	9	60	37	99	6	41	69	97	18	44	100	18	46	3	90	57	22	35	73	97	74	9	35	82
12	63	26	41	8	21	38	15	63	38	100	68	89	24	39	19	29	95	91	70	41	95	83	33	25
13	98	72	9	45	69	50	7	86	5	80	0	8	28	96	45	0	0	26	92	51	11	11	37	91
14	87	88	65	22	98	55	86	9	65	43	64	55	80	30	15	99	26	87	22	39	97	26	50	12
15	5	91	68	44	67	2	71	96	13	73	78	3	12	87	53	9	11	32	57	72	16	35	27	51
16	75	93	62	49	95	82	30	81	24	4	11	30	71	96	49	47	65	8	91	58	40	35	32	7
17	76	15	55	38	29	0	8	20	71	42	81	51	44	76	93	42	87	51	88	65	93	80	66	91
18	26	76	93	84	8	40	96	69	84	52	89	5	16	43	34	37	64	77	85	100	52	99	36	81
19	8	35	6	83	76	8	67	81	13	33	14	86	38	25	33	22	56	36	97	89	20	59	52	9
20	59	73	37	6	26	44	0	24	89	24	78	80	20	6	9	31	32	32	32	23	57	74	49	17
21	87	94	75	45	72	15	39	100	46	99	59	12	22	98	76	16	27	41	31	99	27	24	89	16
22	5	74	8	91	37	5	13	55	13	7	19	24	76	4	25	93	75	80	98	71	37	53	57	75
23	49	60	82	39	40	51	15	71	53	65	86	60	93	31	22	64	77	46	25	2	17	69	68	56
24	2	25	92	97	41	39	98	100	99	87	44	0	99	93	31	69	26	25	71	42	26	22	96	76
25	59	41	49	100	13	0	15	33	62	61	25	59	53	8	17	76	24	25	3	2	76	57	10	18
26	40	13	20	51	81	15	12	45	16	57	47	54	92	60	70	86	98	27	95	66	23	91	73	86
27	80	29	91	36	93	59	19	9	47	61	86	89	96	18	11	56	99	67	21	24	80	60	44	42
28	48	33	7	70	61	95	51	32	89	87	72	6	40	88	52	44	19	62	12	100	62	5	17	62
29	89	5	7	93	48	60	69	97	61	21	87	68	20	4	61	63	75	92	37	35	40	70	25	86
30	97	64	36	30	99	98	23	16	66	28	58	45	34	16	64	71	48	57	15	14	24	25	55	29
31	59	73	71	62	66	34	17	41	32	65	50	73	82	7	20	55	1	86	23	19	40	61	48	95
32	68	75	43	66	66	38	50	31	25	36	26	91	36	100	88	42	74	40	33	92	18	9	34	51
33	34	16	43	38	50	28	34	14	41	2	6	97	56	73	75	17	66	83	32	25	33	32	26	75
34	14	61	81	2	6	973	3	89	79	64	67	80	75	5	66	77	97	82	52	87	25	63	11	67
35	15	39	5	99	29	36	25	40	45	28	34	63	75	18	21	23	13	14	66	70	92	44	23	73
36	68	49	1	55	11	6	63	23	50	33	60	34	82	20	66	48	27	75	74	69	9	23	66	62
37	1	72	18	84	84	66	61	41	22	61	45	36	37	16	20	26	96	39	67	100	71	8	19	29
38	58	73	55	11	9	96	81	84	21	34	50	92	65	91	69	33	23	93	3	37	95	14	84	27
39	91	63	65	63	70	90	57	20	9	13	25	77	72	0	12	30	45	89	94	6	58	72	73	16
40	39	45	31	74	91	85	29	45	98	15	11	60	26	16	36	76	1	85	15	50	27	55	0	86

RANDOM NUMBERS TABLE (continued)

41	94	12	62	59	14	42	32	75	41	41	0	55	5	76	89	46	35	70	20	98	36	93	67	35
42	3	33	41	22	45	37	65	3	96	27	62	77	16	97	81	75	26	89	77	82	54	1	63	24
43	58	2	83	10	50	98	32	65	31	67	84	45	0	90	42	17	21	92	92	47	5	29	6	52
44	29	73	79	48	66	72	32	1	100	3	2	61	35	0	88	100	45	16	48	67	36	37	57	12
45	55	9	63	66	31	5	8	72	4	85	5	44	4	98	2	79	40	75	91	59	66	15	41	19
46	52	13	44	91	39	85	22	33	4	29	52	6	82	77	25	0	4	61	35	45	93	11	9	52
47	31	52	65	63	88	78	21	35	28	22	91	84	4	30	14	0	97	87	46	73	55	62	18	76
48	44	38	76	99	38	67	60	95	67	68	17	18	46	76	83	5	8	87	2	42	65	27	16	22
49	84	47	44	4	67	22	89	78	44	64	66	15	56	0	90	21	25	100	32	66	3	50	92	46
50	71	50	78	48	65	74	21	24	2	23	65	94	51	82	67	16	35	35	61	31	75	8	91	58
51	42	47	81	10	99	40	15	63	77	69	10	32	92	86	32	9	69	50	78	61	78	15	16	79
52	3	70	75	49	90	92	62	0	47	90	78	63	44	60	13	55	28	63	92	17	100	2	40	93
53	31	6	46	39	27	93	81	79	100	94	43	39	79	2	18	82	40	31	81	84	62	41	59	4

SAMPLE CDBG INCOME AND COMMUNITY NEEDS QUESTIONNAIRE

1. Please circle the number of people living in your household, and check if your total household income is above or below the corresponding income figures.

1 person:	income is	_____	above or	_____	below annual income	\$ _____
2	income is	_____	above or	_____	below annual income	\$ _____
persons:						
3	income is	_____	above or	_____	below annual income	\$ _____
persons:						
4	income is	_____	above or	_____	below annual income	\$ _____
persons:						
5	income is	_____	above or	_____	below annual income	\$ _____
persons:						
6	income is	_____	above or	_____	below annual income	\$ _____
persons:						
7	income is	_____	above or	_____	below annual income	\$ _____
persons:						
8	income is	_____	above or	_____	below annual income	\$ _____
persons:		_____		_____		_____

(Use the Low-Income Limits contained in the most recent CDBG General Purpose Application Handbook to enter the income in the last column.)

2. We are interested in finding out what you think are the priority needs in your community. We would like for you to rate the following (#1 being the highest, and #10 being the lowest) in the following listing:

_____ Sewer System	_____ Water System Improvements
_____ Housing Rehab. Projects	_____ Increased Fire Protection
_____ Park and Rec., School	_____ Community Center
_____ Senior Center	_____ Day Care
_____ Streets and Sidewalks	_____ Other (please list)

3. _____ I am 65+ years of age _____ I am less than 65 years of age

4. PRESENT EMPLOYMENT STATUS:

_____ Employed	_____ Part-time Employment
_____ Unemployed	_____ Retired

Comments:

(Note: This survey format can be modified to meet both CDBG and U.S. RECD requirements by simply asking for the actual household income and the number of persons in the household.)

INSTRUCTIONS FOR COMPLETING THE LOW-INCOME WORKSHEET

The Low-Income Worksheet is used to summarize the results of an income survey, establishing a percentage of low-income persons in the target area of the proposed project. Most questions are self explanatory. Make sure answers are logical. For example, the number on Line 4 cannot be smaller than the number on Line 3 (because every household must have at least one person). Similarly, the number on Line 6 cannot be less than the number on Line 5. Also note that the number on Line 3 plus the number on Line 5 should equal the number on Line 2--every household is either low-income or it is not.

- Line 1. Enter the most current estimate of the total number of households in the target area.
- Line 2. For the number of households interviewed, enter the total number of interviews with complete and accurate responses to the income and size of household questions.
- Line 3. Based on income and household size information contained in the survey, determine the number of low-income households interviewed.
- Line 4. Enter the total number of persons living in all households which were determined to be low-income.
- Line 5. Based on the income and household size information, determine the total number of households interviewed in which income was above the low-income level.
- Line 6. Enter the total number of persons living in all households which were determined to be above the low-income level.

For purposes of illustration, assume the target area is estimated to contain 650 households (Line 1). Assume 250 households (Line 2) were interviewed and 130 had low-incomes (Line 3). These low-income households contained 450 persons (Line 4). The 120 households with incomes above the low-income level (Line 5) contained 400 persons (Line 6). Complete Lines 7 through 16 as follows:

- Line 7. If the households interviewed contained 450 low-income persons in 130 households, the number on Line 7 would be 3.46 ($450/130$).
- Line 8. If the households interviewed contained 400 non-low-income persons in 120 households, the number on Line 8 would be 3.33 ($400/120$).
- Line 9. If a total of 250 households were interviewed, 130 of which had low-incomes, the number on Line 9 would be .52 ($130/250$).

INSTRUCTIONS FOR COMPLETING THE LOW-INCOME WORKSHEET (CON'T)

- Line 10. If 120 of the 250 households interviewed did not have low-incomes, the number on Line 10 would be .48 ($120/250$).
- Line 11. If the target area contained an estimated 650 households, and 250 interviewed, of which 130 had low-incomes, the number on Line 11 would be 338 ($650 \times .52$).
- Line 12. Continuing with the example, Line 12 would be 312 ($650 \times .48$).
- Line 13. 3.46 persons per low-income household times 338 low-income households--Line 13 would be 1,169.
- Line 14. 3.33 persons per non-low-income household times 312 non-low-income households--Line 14 would be 1,039.
- Line 15. Total low-income persons (1,169) plus total non-low-income persons (1,039)--Line 15 would be 2,208 estimated total persons.
- Line 16. 1,169 low-income persons divided by 2,208 total persons yields about .5294. Multiplied by 100, this gives an estimate that 52.94 percent of the residents have low-incomes.

LOW-INCOME WORKSHEET

1. Enter the estimated total number of households in the target area. 1. _____
2. Enter the total number of households interviewed. 2. _____
3. Enter the total number of low-income households interviewed. 3. _____
4. Enter the total number of persons living in the low-income households interviewed. 4. _____
5. Enter the total number of households interviewed in which the income was above the low-income level. 5. _____
6. Enter the total number of persons living in the households interviewed in which the income was above the low-income level. 6. _____
7. Divide Line 4 by Line 3. (This is the average size of the low-income household interviewed.) 7. _____
8. Divide Line 6 by Line 5. (This is the average size of the non-low-income household interviewed.) 8. _____
9. Divide Line 3 by Line 2. (This is the percentage of households interviewed that have low-incomes.) 9. _____
10. Divide Line 5 by Line 2. (This is the percentage of households interviewed that do not have low-incomes.) 10. _____
11. Multiply Line 1 by Line 9. (This is the estimate of the total number of low-income households in the target area.) 11. _____
12. Multiply Line 1 by Line 10. (This is the estimate of the total number of non-low-income households in the target area.) 12. _____
13. Multiply Line 7 by Line 11. (This is the estimate of the total number of low-income persons in the target area.) 13. _____
14. Multiply Line 8 by Line 12. (This is the estimate of the total number of non-low-income persons in the target area.) 14. _____
15. Add Line 13 and Line 14. (This is the estimate of the total number of persons in the target area.) 15. _____
16. Divide Line 13 by Line 15, and multiply the resulting decimal by 100. (This is the approximate percentage of persons in the target area who have low-incomes.) 16. _____

APPENDIX F: FEDERAL AND STATE REGULATIONS

Jurisdictions receiving Community Development Block Grant funds must follow a number of federal and state regulations. These laws cover a wide range of activities, such as labor practices, environmental impacts, and civil rights. Listed below are some of the most important regulations that could apply to projects involving CDBG funds. This is a preliminary list and by the time funds are released, it could change, depending upon actions at the federal level. Each regulation is annotated to give the applicant some idea of the requirements that must be met. Since this is only a summary and is not meant to be a comprehensive description of each law, please contact the State Department of Community, Trade and Economic Development if you need more detailed information.

FEDERAL REGULATIONS

Public Law 88-352, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) (24 CFR Part 1)

The law provides that no person in the United States shall, on the grounds of race, color, or national origin, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Public Law 90-284, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.)

The law prohibits any person from discriminating in the sale or rental of housing, the financing of housing or the provisions of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, handicap, familial status, or national origin.

Executive Order 11063, As Amended by Executive Order 12259 (24 CFR Part 107)

Necessary and appropriate action must be taken to prevent discrimination because of race, color, religion, creed, sex or national origin; in the sale, leasing, rental and other disposition of residential property and related facilities (including land to be developed for residential use); or in the use or occupancy thereof if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants or contributions from the federal government.

Section 104(b)4 of the Housing and Community Development Act of 1974, As Amended

The Grantee must comply with the provisions of Section 104(b)4 of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee will identify its community development and housing needs, including the needs of low-income persons and the activities to be undertaken to meet such needs.

Section 104(1) of the Housing and Community Development Act of 1974, As Amended through 1992. Protection of Individuals Engaged in Nonviolent Civil Rights Demonstration

The grantee must comply with the provisions of Section 104(1) of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee must adopt and enforce a policy of prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and it must adopt and enforce a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction.

Section 109 of the Housing and Community Development Act of 1974, As Amended through 1992

No person in the United States shall, on the grounds of race, religion, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with federal community development funds made available pursuant to Title I of the Act.

Age Discrimination Act of 1975, As Amended (42 U.S.C. 6101 et seq.)

No person shall be excluded from participation, denied program benefits, or subjected to discrimination on the basis of age under any program or activity receiving federal funding assistance.

Section 504 of the Rehabilitation Act of 1973, As Amended (29 U.S.C. 794)

No otherwise qualified individual shall, solely, by reason of his or her handicap, be excluded from participation (including employment), denied program benefits or subjected to discrimination under any program or activity receiving federal assistance funds.

Section 3 of the Housing and Community Development Act of 1968 (12 U.S.C. 170 u) (24 CFR Part 135)

To the greatest extent feasible, opportunities for training and employment should be given to lower income persons residing within the unit of local government or the non-metropolitan county in which the project is located, and contracts for work in connection with the project should be awarded to eligible business concerns which are located in, or owned in substantial part, by persons residing in the project area.

Executive Order 11246, As Amended

Executive Order 11246 as amended applies to all federally assisted construction contracts and subcontracts. The grantee and subcontractors, if any, shall take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex or national origin. The grantee or subcontractors will make their books and records available to state and federal officials for purposes of investigation to ascertain compliance.

Section 110 of the Housing and Community Development Act of 1974, As Amended through 1992

All laborers and mechanics employed by contractors or subcontractors on construction work assisted under the Act shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276-a- 276a-5). However, these requirements apply to rehabilitation of residential property only if such property is designed for residential use for eight or more families.

Davis-Bacon Act, As Amended (40 U.S.C. a - et seq.), Section 2; June 13, 1934, As Amended (48 Stat. 948.40 U.S.C. 276(c), Popularly Known as The Copeland Act

This Act mandates that all laborers and mechanics be paid unconditionally and not less often than once a week, and without subsequent deduction or rebate on any account except "permissible" salary deductions, the full amounts due at the time of payments, computed at wage rates not less than those contained in the wage determination issued by the U.S. Department of Labor. Weekly certified payrolls are required to be submitted to the federally-funded recipient by the contractor.

Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.)

According to this Act, no contract work may involve or require laborers or mechanics to work in excess of 40 hours in a work week, unless compensation of not less than one and one-half times the basic rate is paid for the overtime hours. If this Act is violated, the contractor or subcontractor is liable to any affected employee for unpaid wages as well as to the United States for liquidated damages.

Section 104(g) of the Housing and Community Development Act of 1974, As Amended through 1992

Recipients of community development funds made available pursuant to Title 1 of the Act assumes all the responsibilities for environmental review, decision-making, and action pursuant to the National Environmental Policy Act of 1969, that would apply to the Secretary of HUD were he to undertake such projects as federal projects.

The National Environmental Policy Act of 1969 (42 U.S.C. Section 4321, et seq. and 24 CFR Part 58)

The purpose of this Act is to attain the widest use of the environment without degradation, risk to health or safety or other undesirable and unintended consequences. Environmental review procedures, including completing a checklist and determining and publishing a Finding of Significance or No Significance for a proposal, are a necessary part of this process. Pursuant to these provisions, the grantee must also submit environmental certifications to the Agency when requesting that funds be released for the project.

The Clean Air Act, As Amended (42 U.S.C. 7401, et seq.)

The Clean Air Act prohibits (1) engaging in, (2) supporting in any way or providing financial assistance for, (3) licensing or permitting or (4) approving any activity which does not conform to the state implementation plan for natural primary and secondary ambient air quality standards.

HUD Environmental Standards (24 CFR, Part 51, Environmental Criteria and Standards and 44 F.R. 40860-40866, July 12, 1979)

The HUD Environmental Standards prohibit HUD support for most new construction of noise-sensitive uses on sites having unacceptable noise exposure. HUD assistance for the construction of new noise-sensitive uses is prohibited in general for projects with unacceptable noise exposures and is discouraged for projects with normally unacceptable noise exposure.

Executive Order 11990, May 24, 1977: Protection of Wetlands (42 F.R. 26961, et seq.)

The intent of this Executive Order is (1) to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands; and (2) to avoid direct or indirect support of new construction in wetlands wherever there is a practical alternative. In making this determination, the grantee may take into account economic, environmental, and other pertinent factors.

The Wild and Scenic Rivers Act of 1968, As Amended (16 U.S.C. 1271, et seq.)

The purpose of this Act is to preserve selected rivers or sections of rivers in their free-flowing condition, to protect the water quality of such rivers, and to fulfill other vital national conservation goals. Federal assistance by loan, grant, or other mechanism cannot be provided to water resources construction projects that would have a direct and adverse effect on any river included or designed for study or inclusion in the National Wild and Scenic River System.

Executive Order 11988, May 1978: Floodplain Management (42 F.R. 26951, et seq.)

The intent of this Executive Order is to (1) avoid, to the extent possible, adverse impacts associated with the occupancy and modification of floodplains and (2) avoid direct or indirect support of floodplain development wherever there is a practical alternative. If the grantee proposes to conduct, support or allow an action to be located in the floodplain, the grantee must consider alternatives to avoid adverse effects and incompatible involvement in the floodplains. If siting in a floodplain is the only practical alternative, the grantee must, prior to taking any action: (1) design or modify its actions in order to minimize a potential harm to the floodplains; and (2) prepare and circulate a notice containing an explanation of why the action is proposed to be located in a floodplain.

Coastal Zone Management Act of 1972, As Amended (16 U.S.C. 1451, et seq.)

The intent of this is to preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone. Federal agencies cannot approve assistance for proposed projects that are inconsistent with the state's coastal management program, except upon a finding by the U.S. Secretary of Commerce that such a project is consistent with the purpose of this chapter or necessary in the interests of national security.

The Endangered Species Act of 1973, As Amended (16 U.S.C. 1531, et seq.)

The intent of this act is to ensure that all federally assisted projects seek to preserve endangered or threatened species. Projects must not jeopardize the continued existence of endangered and threatened species or result in the destruction of or modification of habitat of such species, which is determined by the U.S. Department of the Interior, after consultation with the state, to be critical.

The Reservoir Salvage Act of 1960 (16 U.S.C. 469 et seq.), Section 3 (16 U.S.C. 469 a-1), As Amended by the Archaeological and Historic Preservation Act of 1974)

The Reservoir Salvage Act provides for the preservation of historical and archaeological data (including relics and specimens) that might otherwise be irreparably lost or destroyed as a result of any alteration of the terrain caused by any federal construction project or federally-licensed activity or program. Whenever any federal agency finds, or is notified in writing by an appropriate historical or archaeological authority, that its activities in connection with any federal construction project or federally-licensed project, activity or program may cause irreparable loss or destruction of significant scientific, prehistoric, historical or archaeological data, the federal agency must notify the U.S. Secretary of Interior in writing and provide appropriate information concerning the project, program or activity.

The Safe Drinking Water Act of 1974 (42 U.S.C. Section 201, 300(f) et seq. and U.S.C. Section 349 as amended, particularly Section 1424(e) (42 U.S.C. Section 300H-303(e))

The Safe Drinking Water Act, as amended, is intended to protect underground sources of water. No commitment for federal financial assistance, according to this Act, shall be entered into for any project which the U.S. Environmental Protection Agency determines may contaminate an aquifer which is the sole or principal drinking water source for an area.

The Federal Water Pollution Control Act of 1972, As Amended including the Clean Water Act of 1977, Public Law 92-212 (33 U.S.C. Section 1251, et seq.)

The Water Pollution Control Act, as amended provides for the restoration of chemical, physical and biological integrity of the nation's water.

The Solid Waste Disposal Act, As Amended by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. Section 6901, et seq.)

The purpose of this Act is to promote the protection of health and the environment and to conserve valuable material and energy resources.

The Fish and Wildlife Coordination Act of 1958, As Amended (16 U.S.C. Section 661, et seq.)

The Act assures that wildlife conservation receives equal consideration and is coordinated with other features of water resource development programs.

EPA List of Violating Facilities

Grantees must ensure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the program are not listed on the U.S. Environmental Protection Agency's list of Violating Facilities and that it will notify the Agency of the receipt of any communication from the Director of the EPA office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by EPA.

Executive Order 11593, and the Preservation of Archaeological and Historical Data Act of 1966 (16 U.S.C. 469 a-1, et seq.)

Grantees must, in connection with its performance of environmental assessments under the NEPA take the following steps:

1. Consult with the State Historical Preservation Officer to identify properties listed in or eligible for inclusion in the National Register of Historic Places that are subject to adverse effects (see 36 CFR Part 800.0) by the proposed activity; and
2. Comply with all requirements established by the state to avoid or mitigate adverse effects upon such properties.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4630) as Amended in 1989

Grantees must inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations of 49 CFR Part 24 and 24 CFR 570.496(a).

The grantee must also certify that it is following a "residential anti-displacement and relocation assistance plan." The plan must contain two components -- a requirement to replace all low income dwelling units that are demolished or converted to a use other than low income housing as a direct result of the use of CDBG assistance and a relocation assistance component.

The grantee must provide relocation payments and offer relocation assistance as described in the Act to all persons displaced as a result of rehabilitation, demolition, or acquisition of real property for an activity assisted under the Community Development Block Grant Program. Such payments and assistance must be provided in a fair and consistent and equitable manner that ensures that the relocation process does not result in a different or separate treatment of such persons on account of race, color, religion, national origin, familial status, handicap, sex or source of income.

The grantee must assure that, within a reasonable period of time prior to displacement, decent, safe, and sanitary replacement dwellings will be available to all displaced families, individuals,

businesses, nonprofit organizations, and farms and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, familial status, handicap, sex, or source of income.

Section 104(d) of the Housing and Community Development Act of 1974, As Amended through 1992

Grantees must adopt a residential anti-displacement and relocation assistance plan. The plan must: (1) provide for one-for-one replacement of low income dwelling units demolished or converted to use other than low to moderate housing as a direct result of the use of CDBG assistance; (2) provide for relocation assistance; and (3) describe steps to minimize displacement.

Title IV of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831)

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831) prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance.

Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments (24 CFR Part 85)

Grantees must comply with the guidelines of Federal Circular A-87, which sets forth principles and standards for determining the costs allowable under grants and contracts involving federal funds.

U.S. Office of Management and Budget Circular A-102, "Uniform Administrative Requirements for Grants-in-Aid to State and Local Governments"

Grantees must comply with OMB Circular A-102 or any equivalent procedures and requirements that the state may prescribe. The Circular is the basis for a number of specific requirements on the financial management and record keeping of CDBG funds. The directive applies to cash depositories, bonding and insurance, record keeping, program income, property management, procurement, close-out, audit, and other requirements. The following Attachments to OMB Circular A-102 do not specifically apply to the grantee's project: "Attachment D - Waiver of Single State Agency Requirements," "Attachment F - Matching Share," and "Attachment M - Standard Forms for Application."

Non-Federal Government Audit Requirements (24 CFR Part 44)

Grantees must comply with the requirements of 24 CFR Part 44, which requires that any Grantee receiving \$100,000 in federal funds, during any year, to have an audit performed for that year. Grantees receiving between \$25,000 and \$100,000 in federal funds, during any year, shall have an audit performed in accordance with generally accepted auditing standards and the following federal auditing standards:

- A. Standards for Audit of Governmental Organizations, Programs, Activities, and Functions, issued by the U.S. General Accounting Office (GAO);

- B. The Single Audit Act of 1984 (P.L. 98-502); and
- C. Circular A-128, Audits of State and Local Governments, issued by the U.S. Office of Management and Budget (OMB).

STATE REGULATIONS

Prevailing Wages, RCW 39.12

This statute mandates that prevailing wages, as determined by the State Department of Labor and Industries, be paid to workers performing under public works contracts.

Uniform Relocation Assistance and Real Property Acquisition Policy Act, RCW 8.26

Grantees must comply with the provisions of Chapter 8.26 RCW and WAC 365-24 when its activities involve any acquisition of real property assisted under this contract and or the displacement of any family, individual, business, nonprofit organization or farm that results from such acquisition.

State Environmental Policy Act (SEPA, RCW 43.21(c)

Local agencies will (1) require environmental checklists from private and public entities considering an action potentially subject to an Environmental Impact Statement requirement of SEPA; (2) make "threshold determinations that such an action will not have a significant environmental impact; (3) provide for the preparation of draft and final EIS if the determination under (2) above is yes; and (4) circulate such EIS's to other agencies and interested parties.

Shoreline Management Act, RCW 90.58

This Act defines a planning program and a permit system which are initiated at the local government level under state guidance. Its purpose is to protect and enhance the state's shorelines, and it includes a comprehensive shoreline inventory process and master program for regulation of shoreline uses. A permit application at the local level must be in compliance with those plans if substantial developments and shoreline modifications occur, and a record of the application and decision must be submitted to the state.

State Building Code, RCW 19.27, and Provisions in Buildings for Aged and Handicapped Persons, RCW 70.92

Grantees must comply with the provisions of Chapter 19.27 RCW and Chapter 70.92 RCW and regulations for Barrier Free Facilities adopted by the Washington State Building Code Advisory Council pursuant to these statutes.

The State Building Code provides for a uniform state building code and mandates counties, cities and towns to administer and enforce its provisions. Local governments are authorized to modify the state building code to fit local conditions as long as such modifications do not provide for weaker control than the minimum standards and objectives called for in the state code.

State Noise Control Act of 1979, RCW 70.107

Objectives of this Act are to assist local governments in implementing local noise ordinances and to control and reduce excessive noise in Washington State.

State Open Public Meeting Act, RCW 42.30

All meetings of the governing body which pertain to this contract shall be open to the public except those where specific provision is made for executive sessions pursuant to Section 42.30.110 of the statute.

RCW 49.60 Law Against Discrimination

Grantees must comply with the provisions of Chapter 49.60 RCW in all activities relating to this contract.

RCW 39.39 Interlocal Cooperation Act

The Interlocal Cooperation Act establishes, as state policy, the authority for local governments, including special purpose districts and Indian tribes, to enter into agreements for providing a broad spectrum of cooperative services. Local governments undertaking joint community development projects can use this Act as a means for establishing interlocal agreements.

State Coastal Zone Management Program

Grantees must consult with the State Coastal Zone Management Agency (Department of Ecology) and must certify that the project is consistent with the State Coastal Zone Management Program.

Governor's Executive Order 89-10, December 11, 1989: Protection of Wetlands, and Governor's Executive Order 90-04, April 21, 1990: Protection of Wetlands

Grantees must ensure that any activities that would adversely affect wetlands are avoided and unavoidable impacts are mitigated. For the purposes of this requirement, mitigation means:

- (1) avoiding the impact altogether by not taking certain action or part of an action;
- (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;
- (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and (6) monitoring the impact and taking appropriate corrective actions.

Emergency work that is essential to save lives and protect property and public health is exempt from these provisions.

**APPENDIX G: JURISDICTIONS WITH 51 PERCENT LMI INCOME
POPULATION
(BASED ON HUD'S 1990 CENSUS DATA)**

CITY/TOWN	% OF LOW INCOME	CITY/TOWN	% OF LOW INCOME
BINGEN	76.40	MOXEE	51.95
BREWSTER	53.93	NACHES	56.05
BRIDGEPORT	56.98	NESPELEM	52.85
BUCODA	68.80	NEWPORT	53.14
CLARKSTON	53.07	OAKVILLE	51.13
CONCONULLY	71.62	OROVILLE	63.60
COULEE CITY	58.13	PE ELL	53.02
CRESTON	55.33	PRESCOTT	62.62
CUSICK	75.80	PULLMAN	56.15
ELLENSBURG	58.67	QUINCY	57.88
ELMA	53.45	RAINIER	58.63
ENDICOTT	59.08	RAYMOND	51.63
EVERSON	53.28	ROSALIA	51.89
FARMINGTON	65.25	ROSLYN	51.59
GEORGE	64.17	ROYAL CITY	62.29
GRAND COULEE	54.74	SOAP LAKE	62.90
GRANDVIEW	51.10	SPRINGDALE	76.95
GRANGER	63.00	STARBUCK	53.94
HAMILTON	55.92	SUNNYSIDE	51.40
HARRAH	52.98	TEKOA	56.23
KITTITAS	54.73	TENINO	57.92
KRUPP	63.83	TIETON	62.95
LAMONT	53.13	TONASKET	51.67
LONG BEACH	51.12	TOPPENISH	63.09
LYMAN	52.83	WAPATO	67.00
MABTON	63.42	WARDEN	53.50
MALDEN	75.90	WILSON CREEK	53.89
MARCUS	63.28	WINTHROP	58.59
MATTAWA	77.35	YELM	63.55
MOSSYROCK	54.46		

APPENDIX H: SUGGESTIONS FOR PROJECT DEVELOPMENT

- ✓ The CDBG application process is competitive, generally requiring a high level of involvement and commitment by members of the applicant community. To assist applicants, a series of steps for selecting a project and getting started on the application process is provided below:
 - **Read the Application Handbook** thoroughly to understand all requirements.
 - **Attend a CDBG application workshop** during September 1996.
 - **Determine that the low- and moderate-income population to be served exceeds 51 percent.** An income/needs survey of the jurisdiction or target area can be used to determine that the low- and moderate-income population exceeds 51 percent. HUD's census data for 1990 may also be used to make this determination. If neither the target area nor the jurisdiction population is comprised of at least 51 percent of low- and moderate-income persons, the project must demonstrate how its policies will target benefits to LMI persons. Survey instructions are described in the Community Survey Guide located in Appendix E. If a survey is used, it must be statistically valid and have been conducted after January 1991. The Low-Income Limits table listed in Appendix C provides updated income limits by county for the survey.
 - **Plan for community/citizen involvement** before developing the application. This will build support for your project and eliminate any potential conflicts or duplication of effort.
 - **Develop and implement a citizen participation strategy** to involve citizens who represent a cross-section of the community such as local officials, special interest groups, and civic organizations. Solicit their advice and participation early in the development of the project concept and proposal. Citizen participation may be obtained through a variety of methods including town meetings, radio and newspaper advertisements, symposiums, work groups, surveys, etc. Strongly consider establishing a team or committee to assist in preparing a draft proposal. Schedule the required public hearing early during the proposal and application development process.

(Note: The Citizen Participation Strategy helps identify sensitive issues before the public hearings and application submittal. Several applicants have discovered it is easier to identify and resolve issues before submittal than after a project is funded.)
 - **Develop a Community Development and Housing Plan if applicable.** A Community Development and Housing Plan **is no longer required** if the jurisdiction has a Comprehensive Plan, developed in accordance with the

Growth Management Act of 1990, and meets the federal Citizen Participation Strategy requirements.

- **Decide whether or not to apply for funding.** Review community priorities identified in the Comprehensive Plan or Community Development and Housing Plan and compare with CDBG-eligible activities; examine application guidelines; and consult with CDBG Program staff before proceeding with development of a CDBG application.
- **Develop a work plan** for preparing the application which identifies the tasks to be completed, the steps that are necessary to meet the threshold requirements, the key individual(s) who will be responsible, a schedule for grant writing team meetings, and the time frames for assembly, editing, approval, copying, and delivery of the application by the due date. Develop the project concept as a team, but have one person do the actual writing.
- **collect preliminary data** related to need, urgency, community demographics, and financial condition of the applicant.
- **Complete application proposal** in draft form as early as possible to allow time for review and “fine tuning” by the grant writing team as well as someone unfamiliar with the project.

Note: Many errors or misunderstandings could be eliminated by providing adequate review time prior to submitting the application.

- **Then have an associate or friend** not directly involved in your project, read your application specifically looking for:
 - ① typos and grammatical errors;
 - ② logical inconsistencies;
 - ③ budget items that are not justified;
 - ④ confusing terms or jargon;
 - ⑤ unsupported statements, unfounded assumptions, or weak documentation; and
 - ⑥ ways to improve the overall application impact.
- **Review the draft proposal** with citizen groups, community leaders, and others identified in the Citizen Participation Strategy.

Once these steps are complete, an applicant is ready to prepare the final CDBG application.